## **MEMO ENDORSED**

## LAW OFFICES OF NATALI J.H. TODD, P.C.

NATALI J.H. TODD MEMBER: NY & MA BAR 26 COURT STREET SUITE 413 BROOKLYN, NY 11242-1134

Tel: 718-797-3055 Fax: 718-504-3900

E-mail: <u>natali\_todd@yahoo.com</u> www.natalitoddlawyer.com

November 26, 2019

Honorable Andrew L Carter United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

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DATE FILED: 12-10-19

Re:

U.S. v. Hernandez, et al. 18 Cr. 420 (ALC)

Dear Judge Carter:

I represent Jerrell Fulcher in the above referenced matter pursuant to C.J.A. I write with the consent of Pre-Trial Services and AUSA Jacob Warren to respectfully request a temporary removal of the electronic bracelet to permit Mr. Fulcher to undergo a Cat Scan on December 3, 2019 and surgery on December 18, 2019. It is my understanding that the presence of the electronic bracelet will interfere with the medical procedures.

In the event that the medical procedures are rescheduled to a different date, Counsel is respectfully requesting that PTSO Joshua Rothman is permitted to remove the electronic bracelet for the specific reasons listed above without further written request to the Court. Thank you for your consideration to this request.

Respectfully,

N. Todd

Natali Todd, Esq.

cc: AUSA Jacob Warren PTSO Joshua Rothman

The application is

\_ granted \_ den<del>ie</del>d.

Andrew L. Carter Jr, U.S.D.J.

Dated: December 10, 2019 NY. New York